

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Indictment

The Grand Jury charges:

At all times relevant to this indictment:

Background

1. The “National Passport Center” is a facility operated by the United States Department of State, Bureau of Consular Affairs, for the filing, processing, and adjudication of United States Passport Applications (forms **DS-11**) and United States Passport Renewal Applications (forms **DS-82**), which are used to apply for passport renewals by mail. The National Passport Center was located at 207 International Drive, Portsmouth, New Hampshire.

2. Title 22, Code of Federal Regulations, Section 51.2 provides that a passport may be issued only to a United States national. Under Title 22, Code of Federal Regulations, Section 50.1(d), a national is a citizen of the United States or a noncitizen owing permanent allegiance to the United States. A non-citizen national is someone who was: (i) born in American Samoa, Swain's Island; (ii) found in American Samoa or Swain's Island at a young age; (iii) a child of a non-citizen United States national who meets certain physical presence or residence requirements; or (iv) born in the Commonwealth of the Northern Marianas Islands and opted to become a non-citizen national instead of a citizen of the United States. 8 U.S.C. § 1408.

COUNT ONE
[False Statements – 18 U.S.C. § 1001(a)(2)]

4. In and around March 2019, but no later than March 8, 2019, in the District of New Hampshire and elsewhere, the defendant,

Todd Daniel Dyson,

in a matter within the jurisdiction of the United States Department of State, an agency of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in connection with a United States Passport Renewal Application (form DS-82). **Dyson** executed a renewal application, which was subsequently received at the National Passport Center. To induce and secure the issuance of a United States Passport, **Dyson** falsely stated on the application a date and place of birth that were not his own. **Dyson** knew that this statement and representation was false when made.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL

/s/ Grand Jury Foreperson
Grand Jury Foreperson

SCOTT W. MURRAY
United States Attorney

/s/ Anna Dronzek
Anna Dronzek
Assistant United States Attorney

Date: September 4, 2019